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July 6, 2004

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W., TW-A325
Washington, D.C. 20544

Re: In the Matter of Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Norwich, Connecticut)
MB Docket No. 04-184
RM-10968

Dear Ms. Dortch:

Enclosed please find, on behalf of Hearst-Argyle Properties, Inc., the original and four copies of Comments of Hearst-Argyle Properties, Inc. for filing in the above-referenced matter.

If any questions should arise during the course of your consideration of this matter, it is respectfully requested that you communicate with the undersigned.

Sincerely,

David Kushner

Enclosures

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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Section 73.622(b),	)	MB Docket No. 04-184
Table of Allotments,	)	RM-10968
Digital Television Broadcast Stations	)	
(Norwich, Connecticut)	)	

COMMENTS OF HEARST-ARGYLE PROPERTIES, INC.

Hearst-Argyle Properties, Inc., licensee of Stations WMUR-TV and WMUR-DT, Manchester, New Hampshire, NTSC Channel 9 and DTV Channel 59 ("WMUR"), through its attorneys and pursuant to Sections 1.420, 73.622(a), and 73.623(c) of the Commission's rules, hereby submits the instant comments in response to the *Notice of Proposed Rule Making* ("*Notice*"), released May 14, 2004, in the above-captioned proceeding. The *Notice* requests comments regarding the petition of Connecticut Public Broadcasting, Inc., licensee of Station WEDN(TV), Norwich, Connecticut ("WEDN"), to amend Section 73.622(b), the DTV Table of Allotments, by substituting DTV Channel 9 for its currently assigned DTV Channel 45. Attached hereto and made a part of the instant Comments is the Engineering Statement of Joseph M. Davis, of Cavell Mertz & Davis Inc., WMUR's consulting engineer.

WMUR urges the Commission to reject WEDN's proposal because the proposal (1) violates the two percent *de minimis* standard specified in Section 73.623(c)(2) of the Commission's rules; (2) unfairly constrains WMUR's ability to operate its digital facility on its current NTSC Channel 9 at the end of the digital television transition; and (3) is contrary to the public interest because additional interference would be caused to numerous WMUR viewers.

I. WEDN's Proposal Violates the Two Percent *De Minimis* Standard in Section 73.623(c)(2)

Section 73.623(c)(2) of the Commission's rules provides that a request to amend the DTV Table of Allotments "must demonstrate that the requested change would not result in more than an additional 2 percent [of] the population served by another station being subject to interference" and that "[t]he station population values for existing NTSC service and DTV service contained in Appendix B of the *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order* . . . are to be used for the purposes of determining whether a power increase or other changes is permissible under this *de minimis* standard."

In WEDN's Petition for Rule Making in the instant proceeding, WEDN asserts that the proposal will result in 1.86% interference to WMUR's NTSC facility. *See* WEDN Petition, Technical Exhibit, Figure 3. WEDN's calculation is based on a baseline population of 4,956,255 persons served by WMUR and interference to 91,949 WMUR viewers.

However, WEDN's calculation violates Section 73.623(c)(2) because it does not use the baseline population for WMUR specified in Appendix B of the *Memorandum Opinion and Order on Reconsideration of the Sixth Report and Order.*[1] Appendix B specifies that the NTSC baseline population for WMUR is 4,322,000. The interference to 91,949 persons represents 2.13% of the baseline population specified in Appendix B, which obviously exceeds the 2% *de minimis* threshold.

In addition to the plain textual language of Section 73.623(c)(2) requiring the use of Appendix B population values for *de minimis* interference evaluations, the Commission has unequivocally stated that Appendix B population values control, and it has specifically refused to adopt modified analyses that would consider other baseline values on the grounds that it would be

[1] 13 FCC Rcd 7418 (1998).

inequitable to change course in midstream. *See* Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, *Memorandum Opinion and Order on Reconsideration*, 16 FCC Rcd 20594 (2001), ¶¶ 60-61.

Because WEDN's proposal would result in 2.13% interference to WMUR's viewers, the proposal violates the 2% *de minimis* standard specified in Section 73.623(c)(2). Accordingly, the Commission should deny WEDN's proposal.

II. WEDN's Proposal Would Unfairly Constrain WMUR's Ability to Operate Its Digital Facility on Its Current NTSC Channel 9 at the End of the Digital Television Transition

As WMUR's assigned DTV Channel 59 is out-of-core, it will be necessary for WMUR to convert its digital operation to its current NTSC Channel 9 at the end of the digital television transition. WMUR's DTV "reversion" to Channel 9 is not speculative but is a necessary result of the Commission's DTV Table of Allotments and the unlikelihood of WMUR being able to find an acceptable alternative DTV channel with characteristics comparable to those of a favorable high VHF channel such as Channel 9, particularly in the northeastern United States where analog and digital operations are already overly crowded. Indeed, the Commission has already recognized the virtual certainty of WMUR's future use of Channel 9 for its DTV operation by presuming that stations with one in-core and one out-of-core channel will remain on their in-core channel after the DTV transition. *See* Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television, *Report and Order and Further Notice of Proposed Rule Making,* 16 FCC Rcd 5946 (2001), ¶ 16 ("We presume that, except in extraordinary circumstances, stations that have one in-core and one out-of-core channel will remain on their in-core channel after the transition.").

While the Commission has acknowledged for some time the likelihood that stations such as WMUR will revert back to their in-core NTSC channel for post-transition DTV operations, it has yet to resolve issues concerning the DTV channel election process and, in particular, the procedures for stations to protect their post-transition DTV channel. *See* Second Periodic Review, *Notice of Proposed Rule Making,* MB Docket No. 03-15, FCC 03-8 (2003). Because of the current lack of channel election procedures, WMUR is unable to protect itself from constraints on its future Channel 9 DTV facilities that would result from WEDN's proposal. Specifically, if WEDN's proposal is accepted, WMUR will be unable to maximize its DTV facilities because such maximized facilities will cause more than 2% interference to the proposed WEDN-DT facilities on Channel 9. *See* Engineering Statement.

Because it is a virtual certainty that WMUR will use Channel 9 for its post-transition DTV operations, it would be unreasonable and inequitable to deprive WMUR of the full digital use of its long-time traditional NTSC channel. Furthermore, WMUR was an "early adopter" of digital television and has been licensed for full-power DTV operation on Channel 59 since early 2000. WMUR should not be penalized for having been allotted an out-of-core DTV transition channel by the Commission with no procedure to protect its future DTV operation.

Because adoption of WEDN's proposal would preclude WMUR from fully maximizing its DTV service on Channel 9, the Commission should deny WEDN's proposal or, at a minimum, defer consideration of the proposal until the channel election issues in MB Docket No. 03-15 have been resolved and WMUR has been afforded an opportunity to protect its future DTV operations on Channel 9.

III. WEDN's Proposal Is Contrary to the Public Interest Because Additional Interference Would Be Caused to Numerous WMUR Viewers

Where, as here, a proposal results in interference to a substantial number of viewers, such a proposal is not in the public interest. Case law has long recognized that "losses in service are *prima facie* inconsistent with the public interest," *West Mich. Telecasters, Inc. v. FCC*, 460 F.2d 883, 889 (D.C. Cir. 1972), and "that . . . curtailment of service is not in the public interest is axiomatic," *Hall v. FCC*, 237 F.2d 567, 572 (D.C. Cir. 1956). As set forth in WEDN's own Petition, WEDN's proposal would result in interference to 91,949 viewers of WMUR's present NTSC Channel 9 facility. Interference to a substantial number of WMUR's viewers would continue when WMUR converts to Channel 9 for its post-transition DTV operations, which, as discussed above, is a virtual certainty. Such interference would substantially harm the ability of significant populations to receive WMUR's local and national programming, including, in particular, its unique and vital political coverage.

WEDN's proposal suggests that a grant of the proposal will result in an increase in service to a certain population. *See* WEDN Petition, ¶ 3. However, more than counterbalancing any such increase in service are the facts that (1) WEDN operates as a satellite station for Station WEDH, Hartford, Connecticut; (2) based on a review of WEDN's website (www.cptv.org), WEDN carries no unique programming not already carried on WEDH; and (3) the northeastern United States is already overly congested with analog and digital television operations. Since the vast majority of WEDN's proposed service population would merely be receiving service 100% duplicative of the service already being received from WEDH, it is unreasonable and unwarranted to subject *any* WMUR viewers to loss of WMUR's unique local and network programming because of interference

from a service whose programming the viewers already receive from another affiliated source.[2]

In addition, because the DTV allotments have already crowded NTSC and DTV operations in the northeastern United States, there is simply no substantial public interest benefit to an allotment proposal that would result in even more interference in this particular region.

Finally, even assuming, *arguendo*, some public interest benefit from the proposed channel change, any such benefit is outweighed by the significant detriment to the substantial number of viewers who will lose over-the-air service from WMUR. The loss of service to nearly 100,000 persons is an overriding public interest harm. Accordingly, the Commission should deny WEDN's proposal.

Conclusion

For the foregoing reasons, WMUR respectfully requests that the Commission reject the amendment to the DTV Table of Allotment proposed in the *Notice*.

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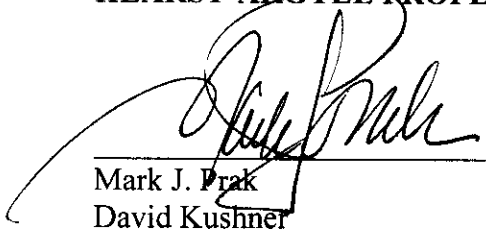
[2] WEDH-DT and WEDN-DT have previously proposed a channel swap. *See* WEDN Petition, ¶ 4 n.1 (citing File Nos. BMPEDT-20031008AAT and BPEDT-19990113KG (as amended Oct. 8, 2003)). If the Commission were to allow WEDH-DT to operate on Channel 45, then a substantial portion of WMUR's viewers who would receive interference from WEDN-DT on Channel 9—in the tens of thousands—would simply be losing service due to interference from a satellite station that merely duplicates completely the service of another station that already serves those same people. *See* Engineering Statement at 3. In this context involving a satellite station in the congested northeastern corridor, the public interest calculus must surely account for this needless loss of service to a full-power station providing unique programming and local service. WMUR expresses no opinion on the merits of the channel swap itself, so long as WEDN's instant proposal to move to Channel 9 is rejected.

Respectfully submitted,

HEARST-ARGYLE PROPERTIES, INC.



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Its Attorneys

July 6, 2004

Exhibit

ENGINEERING STATEMENT
prepared for
Hearst-Argyle Properties, Inc.
WMUR-TV Ch. 9 Manchester, NH
Facility ID 73292

This engineering statement has been prepared on behalf of *Hearst-Argyle Properties, Inc. ("Hearst-Argyle")*, in support of *Comments* in a Notice of Proposed Rulemaking, Media Bureau Docket 04-184.[1] The subject docket proposes to change the paired digital television (DTV) assignment for WEDN (NTSC Channel 53, Norwich, CT) from DTV Channel 45 to DTV Channel 9, as requested by the licensee of WEDN, *Connecticut Public Broadcasting, Inc. ("CPBI")*.

Hearst-Argyle is the licensee of WMUR-TV, Manchester, NH. As discussed below, the proposed allotment change may impact the ability of WMUR-TV to fully utilize its existing analog channel for its final DTV operation.

WMUR-TV is licensed to operate on analog Channel 9 (BMLCT-218) and DTV Channel 59 (BLCDT-19990927ABC). The Channel 59 DTV operation is not within the "core" of Channels 2 through 51. Following the DTV transition, the WMUR-DT operation will have to vacate Channel 59 in favor of a "core" channel, and it is anticipated that *Hearst-Argyle* will choose its existing analog Channel 9 for permanent DTV operation. Due to the congested nature of the television "core" spectrum in the region (nearby to Boston and New York City), it is not likely that any alternate core channel could provide the same level of service as Channel 9 for the permanent WMUR-DT (DTV) operation.

WMUR-TV is located 169.3 km from the proposed allotment point for WEDN-DT Channel 9. This distance is 75.3 km short of the minimum separation requirement of 244.6 km as specified in §73.623(d) of the Commission's Rules for co-channel DTV and analog stations. For co-channel DTV stations (*i.e.*, the future WMUR-DT), the minimum separation distance is also 244.6 km. While the Commission typically does not evaluate changes in the original DTV allotment table based on minimum separation distances, the lack of sufficient distance does underscore that

[1] See *Amendment of Section 73.622(b), Table of Allotments, Digital Television Broadcast Stations (Norwich, Connecticut)*, MB Docket No. 04-184, RM 10968, released May 14, 2004.

interference between the proposed WEDN-DT facility and WMUR-TV is likely for the current analog and future digital WMUR-TV facilities.

WMUR-TV is licensed to operate with an effective radiated power ("ERP") of 282 kW and an antenna height above average terrain ("HAAT") of 314 meters. This represents a maximum analog television facility on a high-band VHF channel in Zone I under §73.614(b)(3). For a future DTV operation of WMUR-DT on Channel 9 (at the licensed analog site and antenna height), the maximum facility is 27.5 kW at 314 meters HAAT.

An interference study based on the Commission's OET Bulletin 69[2] shows that a maximum WMUR-DT facility on Channel 9 does not comply with the present 2% / 10% *de minimis* interference limit with respect to the proposed WEDN-DT Channel 9 allotment. The study determined the additional interference which would be caused should WMUR-TV change from a maximum analog facility to a maximum digital facility on Channel 9.

The attached **Table 1** provides a portion of the output results from the interference analysis, corresponding to WEDN-DT. As indicated thereon, under some scenarios WMUR-DT would "fail" the de minimis limit, causing between 2.2 and 2.6 percent additional interference to WEDN-DT allotment. For instance, under scenario number 18 the interference experienced by WEDN-DT would increase by 53,633 persons (1990 Census data), representing a 2.57 percent increase utilizing a baseline population of 2,090,387.[3]

---

[2]Office of Engineering and Technology Bulletin number 69, *Longley-Rice Methodology for Evaluating TV Coverage and Interference*, February 6, 2004. The implementation of OET-69 for this study followed the guidelines of OET-69 as specified therein. A standard cell size of 2 km was employed, which matches that employed in the WEDN-DT Petition for Rulemaking in MB Docket 04-184. Comparisons of various results of this computer program (run on a Sun processor) to the Commission's implementation of OET-69 show excellent correlation.

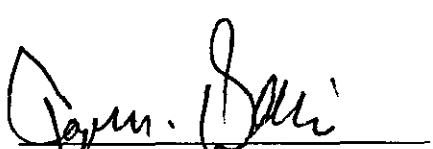
[3]The baseline population for DTV stations is the greater of NTSC or DTV Service Population, from final FCC "Appendix B" table in MM Docket 87-268. For the original WEDN-DT allotment, the NTSC service population is 838,000 and the DTV service population is 839,000. However for allotment changes a new interference-free DTV service population is derived, based on the new DTV allotment. In this case, the specific population varies slightly by scenario. The 2,090,387 persons calculated in the scenario 18 above is not substantially different from the 2,079,000 persons cited in the underlying WEDN-DT Petition for Rulemaking in MB Docket 04-184.

Many scenarios show a 2.2 percent increase in interference, such as scenario number 3. Here, interference to WEDN-DT increases by 45,703 persons, which is 2.16 percent of the 2,112,396 baseline population in this scenario.

These results show that under the current FCC criteria, WMUR-DT would not be able to achieve a maximum DTV facility on Channel 9, due to interference in excess of 2 percent being caused to WEDN-DT. Further, the interference analysis showed that only WEDN-DT would be subject to interference in excess of the present 2% / 10% *de minimis* interference limit. Therefore, if granted, the WEDN-DT channel change proposal could have a limiting effect on WMUR-DT's ability to employ its analog channel with a maximum DTV facility.

Finally, it is noted that WEDN is apparently a satellite station of WEDH(TV) (Facility ID 13602, Hartford, CT), also licensed to *CPBI*. *CPBI* is also proposing that the WEDH-DT operation will employ WEDN's existing DTV allotment of Channel 45 (BPEDT-19990113KG). Examination of the areas of new interference caused to WMUR-TV by WEDN-DT on Channel 9 shows that a significant portion of these areas of new interference would receive interference-free service from WEDH-DT on Channel 45.

The undersigned hereby certifies that the foregoing statement was prepared by him or under his direction, and that it is true and correct to the best of his knowledge and belief.



Joseph M. Davis, P.E.
July 2, 2004

Cavell, Mertz & Davis, Inc.
7839 Ashton Avenue
Manassas, VA 20109
(703) 392-9090

List of Attachments

Table 1 OET Bulletin 69 Analysis Results

Table 1

INTERFERENCE ANALYSIS RESULTS
ANALYSIS OF KHBS(TV)

prepared for

Hearst-Argyle Properties, Inc.

WMUR-TV Ch. 9 Manchester, NH

Facility ID 73292

TV INTERFERENCE and SPACING ANALYSIS PROGRAM

Date: 06-30-2004 Time: 11:04:36

Record Selected for Analysis

WMUR-DT USERRECORD-01 MANCHESTER NH US
Channel 09 ERP 27.5 kW HAAT 315. m RCAMSL 00453 m
Latitude 042-58-59 Longitude 0071-35-19
Status APP Zone 1 Border
Last update Cutoff date Docket
Comments
Applicant

%%%

Analysis of Interference to Affected Station 3

Analysis of current record

Channel	Call	City/State	Application	Ref. No.
09	WEDN	NORWICH CT	BPRM	-20040109AEI

Stations Potentially Affecting This Station

Chan	Call	City/State	Dist(km)	Status	Application	Ref. No.
08	WTNH	NEW HAVEN CT	66.2	LIC	BLCT	-19960926KF
08	WNJB	NEW BRUNSWICK NJ	219.8	CP MOD	BMPEDT	-20000425AAM
08	WMBC-DT	NEWTON NJ	210.5	PLN	DTVPLN	-DTVP0043
09	WMUR-TV	MANCHESTER NH	169.4	LIC	BMLCT	-218
09	WMURTV	MANCHESTER NH	169.4	PLN	DTVPLN	-NPLN0612
09	WWOR-TV	SECAUCUS NJ	178.8	LIC	BLCT	-19810514KF
09	WWOR-TV	SECAUCUS NJ	174.8	APP	BPCT	-20040225AAQ
09	WIXT-TV	SYRACUSE NY	354.7	LIC	BLCT	-19860717KF
09	WBPH-DT	BETHLEHEM PA	294.2	LIC	BPRM	-20011130AHC
09	WBPH-TV	BETHLEHEM PA	294.2	CP MOD	BMPCDT	-20030522ADF
09	WWLF-DT	HAZLETON PA	331.6	PLN	DTVPLN	-DTVP0058
09	WVER-TV	RUTLAND VT	249.8	APP	BPRM	-20000803AAC
10	WTNH-DT	NEW HAVEN CT	66.2	PLN	DTVPLN	-DTVP0068
10	WTNH	NEW HAVEN CT	66.2	CP MOD	BMPCDT	-20031219ACC
10	WTEN	ALBANY NY	195.5	LIC	BLCT	-1285
10	WJAR	PROVIDENCE RI	82.5	LIC	BLCT	-2395
09	WMUR-DT	MANCHESTER NH	169.4	APP	USERRECORD-01	

Total scenarios = 20

Result key: 1
Scenario 1 Affected station 3
Before Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	1002470	2853.5
lost to additional IX by ATV	64813	145.3
lost to ATV IX only	357397	920.2
lost to all IX	1067283	2998.8

Potential Interfering Stations Included in above Scenario 1

8N CT NEW HAVEN BLCT 19960926KF LIC

```
 9N NH MANCHESTER            DTVPLN    NPLN0612     PLN
 9N NJ SECAUCUS              BLCT      19810514KF   LIC
 9N NY SYRACUSE              BLCT      19860717KF   LIC
10N RI PROVIDENCE            BLCT      2395         LIC
10A CT NEW HAVEN             DTVPLN    DTVP0068     PLN

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                   832241       1856.6
   lost to additional IX by ATV      274874       1590.2
   lost to ATV IX only              1060002       3241.0
   lost to all IX                   1107115       3446.8

 Potential Interfering Stations Included in above Scenario     1

 8N CT NEW HAVEN             BLCT      19960926KF   LIC
 9N NJ SECAUCUS              BLCT      19810514KF   LIC
 9N NY SYRACUSE              BLCT      19860717KF   LIC
10N RI PROVIDENCE            BLCT      2395         LIC
10A CT NEW HAVEN             DTVPLN    DTVP0068     PLN
 9A NH MANCHESTER            USERRECORD01           APP

Result key:        2
Scenario        2  Affected station        3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                  1002470       2853.5
   lost to additional IX by ATV       88783        226.0
   lost to ATV IX only               385738       1005.0
   lost to all IX                   1091253       3079.5

 Potential Interfering Stations Included in above Scenario     2

 8N CT NEW HAVEN             BLCT      19960926KF   LIC
 9N NH MANCHESTER            DTVPLN    NPLN0612     PLN
 9N NJ SECAUCUS              BLCT      19810514KF   LIC
 9N NY SYRACUSE              BLCT      19860717KF   LIC
10N RI PROVIDENCE            BLCT      2395         LIC
10A CT NEW HAVEN             BMPCDT    20031219ACC  CP

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                   832241       1856.6
   lost to additional IX by ATV      298844       1670.9
   lost to ATV IX only              1086729       3317.7
   lost to all IX                   1131085       3527.5

 Potential Interfering Stations Included in above Scenario     2

 8N CT NEW HAVEN             BLCT      19960926KF   LIC
 9N NJ SECAUCUS              BLCT      19810514KF   LIC
 9N NY SYRACUSE              BLCT      19860717KF   LIC
10N RI PROVIDENCE            BLCT      2395         LIC
10A CT NEW HAVEN             BMPCDT    20031219ACC  CP
 9A NH MANCHESTER            USERRECORD01           APP

Result key:        3
Scenario        3  Affected station        3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
```

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	996599	2837.4
lost to additional IX by ATV	64813	145.3
lost to ATV IX only	357397	920.2
lost to all IX	1061412	2982.7

Potential Interfering Stations Included in above Scenario 3

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NH MANCHESTER	DTVPLN	NPLN0612	PLN
9N NJ SECAUCUS	BLCT	19810514KF	LIC
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
10A CT NEW HAVEN	DTVPLN	DTVP0068	PLN

After Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	832241	1856.6
lost to additional IX by ATV	274874	1590.2
lost to ATV IX only	1060002	3241.0
lost to all IX	1107115	3446.8

Potential Interfering Stations Included in above Scenario 3

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NJ SECAUCUS	BLCT	19810514KF	LIC
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
10A CT NEW HAVEN	DTVPLN	DTVP0068	PLN
9A NH MANCHESTER	USERRECORD01		APP

The following station failed the de minimis interference criteria.
9D NH MANCHESTER USERRECORD01
ERP 27.50 kW HAAT 315.0 m RCAMSL 453.0 m
Antenna none

Due to interference to the following station and scenario: 3
9D CT NORWICH BPRM 20040109AEI
ERP 6.00 kW HAAT 192.0 m RCAMSL 284.0 m
Antenna 99999999999999

Percent Service lost without proposal: 0.0 to BPRM 20040109AEI
Percent Service lost with proposal: 2.2 to BPRM 20040109AEI

Result key: 4
Scenario 4 Affected station 3
Before Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	996599	2837.4
lost to additional IX by ATV	88783	226.0
lost to ATV IX only	385738	1005.0
lost to all IX	1085382	3063.4

Potential Interfering Stations Included in above Scenario 4

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NH MANCHESTER	DTVPLN	NPLN0612	PLN
9N NJ SECAUCUS	BLCT	19810514KF	LIC
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
10A CT NEW HAVEN	BMPCDT	20031219ACC	CP

After Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	832241	1856.6
lost to additional IX by ATV	298844	1670.9
lost to ATV IX only	1086729	3317.7
lost to all IX	1131085	3527.5

Potential Interfering Stations Included in above Scenario 4

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NJ SECAUCUS	BLCT	19810514KF	LIC
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
10A CT NEW HAVEN	BMPCDT	20031219ACC	CP
9A NH MANCHESTER	USERRECORD01		APP

The following station failed the de minimis interference criteria.
9D NH MANCHESTER USERRECORD01
ERP 27.50 kW HAAT 315.0 m RCAMSL 453.0 m
Antenna none

Due to interference to the following station and scenario: 4
9D CT NORWICH BPRM 20040109AEI
ERP 6.00 kW HAAT 192.0 m RCAMSL 284.0 m
Antenna 99999999999999

Percent Service lost without proposal: 0.0 to BPRM 20040109AEI
Percent Service lost with proposal: 2.2 to BPRM 20040109AEI

Result key: 5
Scenario 5 Affected station 3
Before Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	1002470	2853.5
lost to additional IX by ATV	64949	149.3
lost to ATV IX only	410571	1025.2
lost to all IX	1067419	3002.8

Potential Interfering Stations Included in above Scenario 5

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NH MANCHESTER	DTVPLN	NPLN0612	PLN
9N NJ SECAUCUS	BLCT	19810514KF	LIC
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
9A VT RUTLAND	BPRM	20000803AAC	APP
10A CT NEW HAVEN	DTVPLN	DTVP0068	PLN

After Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	832241	1856.6
lost to additional IX by ATV	275010	1594.3
lost to ATV IX only	1060138	3245.0
lost to all IX	1107251	3450.8

Potential Interfering Stations Included in above Scenario 5

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NJ SECAUCUS	BLCT	19810514KF	LIC
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
9A VT RUTLAND	BPRM	20000803AAC	APP
10A CT NEW HAVEN	DTVPLN	DTVP0068	PLN

Table 1
(page 5 of 16)

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 9A NH MANCHESTER           USERRECORD01           APP

Result key:        6
Scenario        6  Affected station        3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                    POPULATION   AREA (sq km)
   within Noise Limited Contour      3906178       21161.2
   not affected by terrain losses    3173808       19538.7
   lost to NTSC IX                   1002470        2853.5
   lost to additional IX by ATV        88919         230.1
   lost to ATV IX only                438505        1105.9
   lost to all IX                    1091389        3083.6

 Potential Interfering Stations Included in above Scenario     6

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NH MANCHESTER           DTVPLN    NPLN0612     PLN
 9N NJ SECAUCUS             BLCT      19810514KF   LIC
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
 9A VT RUTLAND              BPRM      20000803AAC  APP
10A CT NEW HAVEN            BMPCDT    20031219ACC  CP

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                    POPULATION   AREA (sq km)
   within Noise Limited Contour      3906178       21161.2
   not affected by terrain losses    3173808       19538.7
   lost to NTSC IX                    832241        1856.6
   lost to additional IX by ATV       298980        1675.0
   lost to ATV IX only               1086865        3321.7
   lost to all IX                    1131221        3531.6

 Potential Interfering Stations Included in above Scenario     6

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NJ SECAUCUS             BLCT      19810514KF   LIC
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
 9A VT RUTLAND              BPRM      20000803AAC  APP
10A CT NEW HAVEN            BMPCDT    20031219ACC  CP
 9A NH MANCHESTER           USERRECORD01           APP

Result key:        7
Scenario        7  Affected station        3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                    POPULATION   AREA (sq km)
   within Noise Limited Contour      3906178       21161.2
   not affected by terrain losses    3173808       19538.7
   lost to NTSC IX                   1002470        2853.5
   lost to additional IX by ATV        64813         145.3
   lost to ATV IX only                357397         920.2
   lost to all IX                    1067283        2998.8

 Potential Interfering Stations Included in above Scenario     7

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NH MANCHESTER           DTVPLN    NPLN0612     PLN
 9N NJ SECAUCUS             BLCT      19810514KF   LIC
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
10A CT NEW HAVEN            DTVPLN    DTVP0068     PLN
 9A VT RUTLAND              BPRM      20000803AAC  APP

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                    POPULATION   AREA (sq km)
```

within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	832241	1856.6
lost to additional IX by ATV	274874	1590.2
lost to ATV IX only	1060002	3241.0
lost to all IX	1107115	3446.8

Potential Interfering Stations Included in above Scenario 7

8N	CT NEW HAVEN	BLCT	19960926KF	LIC
9N	NJ SECAUCUS	BLCT	19810514KF	LIC
9N	NY SYRACUSE	BLCT	19860717KF	LIC
10N	RI PROVIDENCE	BLCT	2395	LIC
10A	CT NEW HAVEN	DTVPLN	DTVP0068	PLN
9A	NH MANCHESTER	USERRECORD01		APP
9A	VT RUTLAND	BPRM	20000803AAC	APP

Result key: 8
Scenario 8 Affected station 3
Before Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	1002470	2853.5
lost to additional IX by ATV	88783	226.0
lost to ATV IX only	385738	1005.0
lost to all IX	1091253	3079.5

Potential Interfering Stations Included in above Scenario 8

8N	CT NEW HAVEN	BLCT	19960926KF	LIC
9N	NH MANCHESTER	DTVPLN	NPLN0612	PLN
9N	NJ SECAUCUS	BLCT	19810514KF	LIC
9N	NY SYRACUSE	BLCT	19860717KF	LIC
10N	RI PROVIDENCE	BLCT	2395	LIC
10A	CT NEW HAVEN	BMPCDT	20031219ACC	CP
9A	VT RUTLAND	BPRM	20000803AAC	APP

After Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	832241	1856.6
lost to additional IX by ATV	298844	1670.9
lost to ATV IX only	1086729	3317.7
lost to all IX	1131085	3527.5

Potential Interfering Stations Included in above Scenario 8

8N	CT NEW HAVEN	BLCT	19960926KF	LIC
9N	NJ SECAUCUS	BLCT	19810514KF	LIC
9N	NY SYRACUSE	BLCT	19860717KF	LIC
10N	RI PROVIDENCE	BLCT	2395	LIC
10A	CT NEW HAVEN	BMPCDT	20031219ACC	CP
9A	NH MANCHESTER	USERRECORD01		APP
9A	VT RUTLAND	BPRM	20000803AAC	APP

Result key: 9
Scenario 9 Affected station 3
Before Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	1012644	2958.4
lost to additional IX by ATV	54495	125.1
lost to ATV IX only	410571	1025.2
lost to all IX	1067139	3083.6

```
 Potential Interfering Stations Included in above Scenario     9

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NH MANCHESTER           DTVPLN    NPLN0612     PLN
 9N NJ SECAUCUS             BPCT      20040225AAQ  APP
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
 9A VT RUTLAND              BPRM      20000803AAC  APP
10A CT NEW HAVEN            DTVPLN    DTVP0068     PLN

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                   873941       2018.0
   lost to additional IX by ATV      240960       1517.6
   lost to ATV IX only              1060138       3245.0
   lost to all IX                   1114901       3535.6

 Potential Interfering Stations Included in above Scenario     9

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NJ SECAUCUS             BPCT      20040225AAQ  APP
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
 9A VT RUTLAND              BPRM      20000803AAC  APP
10A CT NEW HAVEN            DTVPLN    DTVP0068     PLN
 9A NH MANCHESTER           USERRECORD01           APP

 The following station failed the de minimis interference criteria.
  9D NH MANCHESTER          USERRECORD01
 ERP   27.50 kW  HAAT   315.0 m  RCAMSL   453.0 m
 Antenna     none

 Due to interference to the following station and scenario:     9
  9D CT NORWICH             BPRM      20040109AEI
 ERP    6.00 kW  HAAT   192.0 m  RCAMSL   284.0 m
 Antenna     99999999999999

 Percent Service lost without proposal:     0.0  to BPRM      20040109AEI
 Percent Service lost with proposal:        2.3  to BPRM      20040109AEI


Result key:       10
Scenario       10  Affected station       3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                  1012644       2958.4
   lost to additional IX by ATV       76648        189.7
   lost to ATV IX only               438505       1105.9
   lost to all IX                   1089292       3148.1

 Potential Interfering Stations Included in above Scenario    10

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NH MANCHESTER           DTVPLN    NPLN0612     PLN
 9N NJ SECAUCUS             BPCT      20040225AAQ  APP
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
 9A VT RUTLAND              BPRM      20000803AAC  APP
10A CT NEW HAVEN            BMPCDT    20031219ACC  CP

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
```

lost to NTSC IX	873941	2018.0
lost to additional IX by ATV	263113	1582.1
lost to ATV IX only	1086865	3321.7
lost to all IX	1137054	3600.2

Potential Interfering Stations Included in above Scenario 10

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NJ SECAUCUS	BPCT	20040225AAQ	APP
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
9A VT RUTLAND	BPRM	20000803AAC	APP
10A CT NEW HAVEN	BMPCDT	20031219ACC	CP
9A NH MANCHESTER	USERRECORD01		APP

The following station failed the de minimis interference criteria.
9D NH MANCHESTER USERRECORD01
ERP 27.50 kW HAAT 315.0 m RCAMSL 453.0 m
Antenna none

Due to interference to the following station and scenario: 10
9D CT NORWICH BPRM 20040109AEI
ERP 6.00 kW HAAT 192.0 m RCAMSL 284.0 m
Antenna 99999999999999

Percent Service lost without proposal: 0.0 to BPRM 20040109AEI
Percent Service lost with proposal: 2.3 to BPRM 20040109AEI

Result key: 11
Scenario 11 Affected station 3
Before Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	1012644	2958.4
lost to additional IX by ATV	54495	125.1
lost to ATV IX only	357397	920.2
lost to all IX	1067139	3083.6

Potential Interfering Stations Included in above Scenario 11

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NH MANCHESTER	DTVPLN	NPLN0612	PLN
9N NJ SECAUCUS	BPCT	20040225AAQ	APP
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
10A CT NEW HAVEN	DTVPLN	DTVP0068	PLN
9A VT RUTLAND	BPRM	20000803AAC	APP

After Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	873941	2018.0
lost to additional IX by ATV	240960	1517.6
lost to ATV IX only	1060002	3241.0
lost to all IX	1114901	3535.6

Potential Interfering Stations Included in above Scenario 11

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NJ SECAUCUS	BPCT	20040225AAQ	APP
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
10A CT NEW HAVEN	DTVPLN	DTVP0068	PLN
9A NH MANCHESTER	USERRECORD01		APP
9A VT RUTLAND	BPRM	20000803AAC	APP

The following station failed the de minimis interference criteria.
9D NH MANCHESTER USERRECORD01

```
 ERP   27.50 kW  HAAT   315.0 m  RCAMSL   453.0 m
 Antenna     none

 Due to interference to the following station and scenario:    11
  9D CT NORWICH              BPRM      20040109AEI
 ERP    6.00 kW  HAAT   192.0 m  RCAMSL   284.0 m
 Antenna     99999999999999

 Percent Service lost without proposal:     0.0  to BPRM      20040109AEI
 Percent Service lost with proposal:        2.3  to BPRM      20040109AEI


Result key:       12
Scenario       12  Affected station       3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178       21161.2
   not affected by terrain losses   3173808       19538.7
   lost to NTSC IX                  1012644        2958.4
   lost to additional IX by ATV       76648         189.7
   lost to ATV IX only               385738        1005.0
   lost to all IX                   1089292        3148.1

 Potential Interfering Stations Included in above Scenario    12

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NH MANCHESTER           DTVPLN    NPLN0612     PLN
 9N NJ SECAUCUS             BPCT      20040225AAQ  APP
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
10A CT NEW HAVEN            BMPCDT    20031219ACC  CP
 9A VT RUTLAND              BPRM      20000803AAC  APP

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178       21161.2
   not affected by terrain losses   3173808       19538.7
   lost to NTSC IX                   873941        2018.0
   lost to additional IX by ATV      263113        1582.1
   lost to ATV IX only              1086729        3317.7
   lost to all IX                   1137054        3600.2

 Potential Interfering Stations Included in above Scenario    12

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NJ SECAUCUS             BPCT      20040225AAQ  APP
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
10A CT NEW HAVEN            BMPCDT    20031219ACC  CP
 9A NH MANCHESTER           USERRECORD01           APP
 9A VT RUTLAND              BPRM      20000803AAC  APP

 The following station failed the de minimis interference criteria.
  9D NH MANCHESTER           USERRECORD01
 ERP   27.50 kW  HAAT   315.0 m  RCAMSL   453.0 m
 Antenna     none

 Due to interference to the following station and scenario:    12
  9D CT NORWICH              BPRM      20040109AEI
 ERP    6.00 kW  HAAT   192.0 m  RCAMSL   284.0 m
 Antenna     99999999999999

 Percent Service lost without proposal:     0.0  to BPRM      20040109AEI
 Percent Service lost with proposal:        2.3  to BPRM      20040109AEI


Result key:       13
Scenario       13  Affected station       3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
```

HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	996599	2837.4
lost to additional IX by ATV	64949	149.3
lost to ATV IX only	410571	1025.2
lost to all IX	1061548	2986.7

Potential Interfering Stations Included in above Scenario 13

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NH MANCHESTER	DTVPLN	NPLN0612	PLN
9N NJ SECAUCUS	BLCT	19810514KF	LIC
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
9A VT RUTLAND	BPRM	20000803AAC	APP
10A CT NEW HAVEN	DTVPLN	DTVP0068	PLN

After Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	832241	1856.6
lost to additional IX by ATV	275010	1594.3
lost to ATV IX only	1060138	3245.0
lost to all IX	1107251	3450.8

Potential Interfering Stations Included in above Scenario 13

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NJ SECAUCUS	BLCT	19810514KF	LIC
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
9A VT RUTLAND	BPRM	20000803AAC	APP
10A CT NEW HAVEN	DTVPLN	DTVP0068	PLN
9A NH MANCHESTER	USERRECORD01		APP

The following station failed the de minimis interference criteria.
9D NH MANCHESTER USERRECORD01
ERP 27.50 kW HAAT 315.0 m RCAMSL 453.0 m
Antenna none

Due to interference to the following station and scenario: 13
9D CT NORWICH BPRM 20040109AEI
ERP 6.00 kW HAAT 192.0 m RCAMSL 284.0 m
Antenna 99999999999999

Percent Service lost without proposal: 0.0 to BPRM 20040109AEI
Percent Service lost with proposal: 2.2 to BPRM 20040109AEI

Result key: 14
Scenario 14 Affected station 3
Before Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	996599	2837.4
lost to additional IX by ATV	88919	230.1
lost to ATV IX only	438505	1105.9
lost to all IX	1085518	3067.4

Potential Interfering Stations Included in above Scenario 14

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NH MANCHESTER	DTVPLN	NPLN0612	PLN
9N NJ SECAUCUS	BLCT	19810514KF	LIC
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
9A VT RUTLAND	BPRM	20000803AAC	APP

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10A CT NEW HAVEN            BMPCDT    20031219ACC  CP

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                   832241       1856.6
   lost to additional IX by ATV      298980       1675.0
   lost to ATV IX only              1086865       3321.7
   lost to all IX                   1131221       3531.6

 Potential Interfering Stations Included in above Scenario    14

 8N CT NEW HAVEN             BLCT      19960926KF   LIC
 9N NJ SECAUCUS              BLCT      19810514KF   LIC
 9N NY SYRACUSE              BLCT      19860717KF   LIC
10N RI PROVIDENCE            BLCT      2395         LIC
 9A VT RUTLAND               BPRM      20000803AAC  APP
10A CT NEW HAVEN             BMPCDT    20031219ACC  CP
 9A NH MANCHESTER            USERRECORD01           APP

 The following station failed the de minimis interference criteria.
  9D NH MANCHESTER            USERRECORD01
 ERP   27.50 kW  HAAT   315.0 m  RCAMSL   453.0 m
 Antenna     none

 Due to interference to the following station and scenario:    14
  9D CT NORWICH               BPRM      20040109AEI
 ERP    6.00 kW  HAAT   192.0 m  RCAMSL   284.0 m
 Antenna     99999999999999

 Percent Service lost without proposal:     0.0  to BPRM      20040109AEI
 Percent Service lost with proposal:        2.2  to BPRM      20040109AEI


Result key:       15
Scenario       15  Affected station       3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                   996599       2837.4
   lost to additional IX by ATV       64813        145.3
   lost to ATV IX only               357397        920.2
   lost to all IX                   1061412       2982.7

 Potential Interfering Stations Included in above Scenario    15

 8N CT NEW HAVEN             BLCT      19960926KF   LIC
 9N NH MANCHESTER            DTVPLN    NPLN0612     PLN
 9N NJ SECAUCUS              BLCT      19810514KF   LIC
 9N NY SYRACUSE              BLCT      19860717KF   LIC
10N RI PROVIDENCE            BLCT      2395         LIC
10A CT NEW HAVEN             DTVPLN    DTVP0068     PLN
 9A VT RUTLAND               BPRM      20000803AAC  APP

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                  POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                   832241       1856.6
   lost to additional IX by ATV      274874       1590.2
   lost to ATV IX only              1060002       3241.0
   lost to all IX                   1107115       3446.8

 Potential Interfering Stations Included in above Scenario    15

 8N CT NEW HAVEN             BLCT      19960926KF   LIC
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```
 9N NJ SECAUCUS              BLCT       19810514KF   LIC
 9N NY SYRACUSE              BLCT       19860717KF   LIC
10N RI PROVIDENCE            BLCT       2395         LIC
10A CT NEW HAVEN             DTVPLN     DTVP0068     PLN
 9A NH MANCHESTER            USERRECORD01            APP
 9A VT RUTLAND               BPRM       20000803AAC  APP

 The following station failed the de minimis interference criteria.
  9D NH MANCHESTER           USERRECORD01
 ERP   27.50 kW  HAAT   315.0 m  RCAMSL   453.0 m
 Antenna     none

 Due to interference to the following station and scenario:    15
  9D CT NORWICH              BPRM       20040109AEI
 ERP    6.00 kW  HAAT   192.0 m  RCAMSL   284.0 m
 Antenna     99999999999999

 Percent Service lost without proposal:      0.0  to BPRM      20040109AEI
 Percent Service lost with proposal:         2.2  to BPRM      20040109AEI


Result key:       16
Scenario       16  Affected station        3
Before Analysis

Results for:  9A CT NORWICH              BPRM       20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178       21161.2
   not affected by terrain losses   3173808       19538.7
   lost to NTSC IX                   996599        2837.4
   lost to additional IX by ATV       88783         226.0
   lost to ATV IX only               385738        1005.0
   lost to all IX                   1085382        3063.4

 Potential Interfering Stations Included in above Scenario    16

 8N CT NEW HAVEN             BLCT       19960926KF   LIC
 9N NH MANCHESTER            DTVPLN     NPLN0612     PLN
 9N NJ SECAUCUS              BLCT       19810514KF   LIC
 9N NY SYRACUSE              BLCT       19860717KF   LIC
10N RI PROVIDENCE            BLCT       2395         LIC
10A CT NEW HAVEN             BMPCDT     20031219ACC  CP
 9A VT RUTLAND               BPRM       20000803AAC  APP

After Analysis

Results for:  9A CT NORWICH              BPRM       20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178       21161.2
   not affected by terrain losses   3173808       19538.7
   lost to NTSC IX                   832241        1856.6
   lost to additional IX by ATV      298844        1670.9
   lost to ATV IX only              1086729        3317.7
   lost to all IX                   1131085        3527.5

 Potential Interfering Stations Included in above Scenario    16

 8N CT NEW HAVEN             BLCT       19960926KF   LIC
 9N NJ SECAUCUS              BLCT       19810514KF   LIC
 9N NY SYRACUSE              BLCT       19860717KF   LIC
10N RI PROVIDENCE            BLCT       2395         LIC
10A CT NEW HAVEN             BMPCDT     20031219ACC  CP
 9A NH MANCHESTER            USERRECORD01            APP
 9A VT RUTLAND               BPRM       20000803AAC  APP

 The following station failed the de minimis interference criteria.
  9D NH MANCHESTER           USERRECORD01
 ERP   27.50 kW  HAAT   315.0 m  RCAMSL   453.0 m
 Antenna     none

 Due to interference to the following station and scenario:    16
  9D CT NORWICH              BPRM       20040109AEI
 ERP    6.00 kW  HAAT   192.0 m  RCAMSL   284.0 m
 Antenna     99999999999999
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 Percent Service lost without proposal:      0.0  to BPRM      20040109AEI
 Percent Service lost with proposal:         2.2  to BPRM      20040109AEI


Result key:       17
Scenario       17  Affected station        3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                  1006773       2942.3
   lost to additional IX by ATV       54495        125.1
   lost to ATV IX only               410571       1025.2
   lost to all IX                   1061268       3067.4

 Potential Interfering Stations Included in above Scenario    17

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NH MANCHESTER           DTVPLN    NPLN0612     PLN
 9N NJ SECAUCUS             BPCT      20040225AAQ  APP
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
 9A VT RUTLAND              BPRM      20000803AAC  APP
10A CT NEW HAVEN            DTVPLN    DTVP0068     PLN

After Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                   873941       2018.0
   lost to additional IX by ATV      240960       1517.6
   lost to ATV IX only              1060138       3245.0
   lost to all IX                   1114901       3535.6

 Potential Interfering Stations Included in above Scenario    17

 8N CT NEW HAVEN            BLCT      19960926KF   LIC
 9N NJ SECAUCUS             BPCT      20040225AAQ  APP
 9N NY SYRACUSE             BLCT      19860717KF   LIC
10N RI PROVIDENCE           BLCT      2395         LIC
 9A VT RUTLAND              BPRM      20000803AAC  APP
10A CT NEW HAVEN            DTVPLN    DTVP0068     PLN
 9A NH MANCHESTER           USERRECORD01           APP

 The following station failed the de minimis interference criteria.
  9D NH MANCHESTER          USERRECORD01
 ERP   27.50 kW  HAAT   315.0 m  RCAMSL   453.0 m
 Antenna     none

 Due to interference to the following station and scenario:    17
  9D CT NORWICH             BPRM      20040109AEI
 ERP    6.00 kW  HAAT   192.0 m  RCAMSL   284.0 m
 Antenna     99999999999999

 Percent Service lost without proposal:      0.0  to BPRM      20040109AEI
 Percent Service lost with proposal:         2.5  to BPRM      20040109AEI


Result key:       18
Scenario       18  Affected station        3
Before Analysis

Results for:  9A CT NORWICH              BPRM      20040109AEI  APP
   HAAT  192.0 m, ATV ERP    6.0 kW
                                 POPULATION   AREA (sq km)
   within Noise Limited Contour     3906178      21161.2
   not affected by terrain losses   3173808      19538.7
   lost to NTSC IX                  1006773       2942.3
   lost to additional IX by ATV       76648        189.7
   lost to ATV IX only               438505       1105.9
   lost to all IX                   1083421       3132.0
```

Potential Interfering Stations Included in above Scenario 18

8N	CT	NEW HAVEN	BLCT	19960926KF	LIC
9N	NH	MANCHESTER	DTVPLN	NPLN0612	PLN
9N	NJ	SECAUCUS	BPCT	20040225AAQ	APP
9N	NY	SYRACUSE	BLCT	19860717KF	LIC
10N	RI	PROVIDENCE	BLCT	2395	LIC
9A	VT	RUTLAND	BPRM	20000803AAC	APP
10A	CT	NEW HAVEN	BMPCDT	20031219ACC	CP

After Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	873941	2018.0
lost to additional IX by ATV	263113	1582.1
lost to ATV IX only	1086865	3321.7
lost to all IX	1137054	3600.2

Potential Interfering Stations Included in above Scenario 18

8N	CT	NEW HAVEN	BLCT	19960926KF	LIC
9N	NJ	SECAUCUS	BPCT	20040225AAQ	APP
9N	NY	SYRACUSE	BLCT	19860717KF	LIC
10N	RI	PROVIDENCE	BLCT	2395	LIC
9A	VT	RUTLAND	BPRM	20000803AAC	APP
10A	CT	NEW HAVEN	BMPCDT	20031219ACC	CP
9A	NH	MANCHESTER	USERRECORD01		APP

The following station failed the de minimis interference criteria.
9D NH MANCHESTER USERRECORD01
ERP 27.50 kW HAAT 315.0 m RCAMSL 453.0 m
Antenna none

Due to interference to the following station and scenario: 18
9D CT NORWICH BPRM 20040109AEI
ERP 6.00 kW HAAT 192.0 m RCAMSL 284.0 m
Antenna 99999999999999

Percent Service lost without proposal: 0.0 to BPRM 20040109AEI
Percent Service lost with proposal: 2.6 to BPRM 20040109AEI

Result key: 19
Scenario 19 Affected station 3
Before Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	1006773	2942.3
lost to additional IX by ATV	54495	125.1
lost to ATV IX only	357397	920.2
lost to all IX	1061268	3067.4

Potential Interfering Stations Included in above Scenario 19

8N	CT	NEW HAVEN	BLCT	19960926KF	LIC
9N	NH	MANCHESTER	DTVPLN	NPLN0612	PLN
9N	NJ	SECAUCUS	BPCT	20040225AAQ	APP
9N	NY	SYRACUSE	BLCT	19860717KF	LIC
10N	RI	PROVIDENCE	BLCT	2395	LIC
10A	CT	NEW HAVEN	DTVPLN	DTVP0068	PLN
9A	VT	RUTLAND	BPRM	20000803AAC	APP

After Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7

lost to NTSC IX	873941	2018.0
lost to additional IX by ATV	240960	1517.6
lost to ATV IX only	1060002	3241.0
lost to all IX	1114901	3535.6

Potential Interfering Stations Included in above Scenario 19

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NJ SECAUCUS	BPCT	20040225AAQ	APP
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
10A CT NEW HAVEN	DTVPLN	DTVP0068	PLN
9A NH MANCHESTER	USERRECORD01		APP
9A VT RUTLAND	BPRM	20000803AAC	APP

The following station failed the de minimis interference criteria.
9D NH MANCHESTER USERRECORD01
ERP 27.50 kW HAAT 315.0 m RCAMSL 453.0 m
Antenna none

Due to interference to the following station and scenario: 19
9D CT NORWICH BPRM 20040109AEI
ERP 6.00 kW HAAT 192.0 m RCAMSL 284.0 m
Antenna 99999999999999

Percent Service lost without proposal: 0.0 to BPRM 20040109AEI
Percent Service lost with proposal: 2.5 to BPRM 20040109AEI

Result key: 20
Scenario 20 Affected station 3
Before Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	1006773	2942.3
lost to additional IX by ATV	76648	189.7
lost to ATV IX only	385738	1005.0
lost to all IX	1083421	3132.0

Potential Interfering Stations Included in above Scenario 20

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NH MANCHESTER	DTVPLN	NPLN0612	PLN
9N NJ SECAUCUS	BPCT	20040225AAQ	APP
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
10A CT NEW HAVEN	BMPCDT	20031219ACC	CP
9A VT RUTLAND	BPRM	20000803AAC	APP

After Analysis

Results for: 9A CT NORWICH BPRM 20040109AEI APP
HAAT 192.0 m, ATV ERP 6.0 kW

	POPULATION	AREA (sq km)
within Noise Limited Contour	3906178	21161.2
not affected by terrain losses	3173808	19538.7
lost to NTSC IX	873941	2018.0
lost to additional IX by ATV	263113	1582.1
lost to ATV IX only	1086729	3317.7
lost to all IX	1137054	3600.2

Potential Interfering Stations Included in above Scenario 20

8N CT NEW HAVEN	BLCT	19960926KF	LIC
9N NJ SECAUCUS	BPCT	20040225AAQ	APP
9N NY SYRACUSE	BLCT	19860717KF	LIC
10N RI PROVIDENCE	BLCT	2395	LIC
10A CT NEW HAVEN	BMPCDT	20031219ACC	CP
9A NH MANCHESTER	USERRECORD01		APP
9A VT RUTLAND	BPRM	20000803AAC	APP

The following station failed the de minimis interference criteria.
9D NH MANCHESTER USERRECORD01

Table 1
(page 16 of 16)

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ERP   27.50 kW  HAAT   315.0 m  RCAMSL   453.0 m
Antenna     none

Due to interference to the following station and scenario:    20
 9D CT NORWICH              BPRM      20040109AEI
ERP    6.00 kW  HAAT   192.0 m  RCAMSL   284.0 m
Antenna     99999999999999

Percent Service lost without proposal:     0.0  to BPRM      20040109AEI
Percent Service lost with proposal:        2.6  to BPRM      20040109AEI
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Certificate of Service

The undersigned, of the law firm of Brooks, Pierce, McLendon, Humphrey & Leonard, L.L.P., hereby certifies that s/he has caused a copy of the foregoing **Comments of Hearst-Argyle Properties, Inc.** to be placed in the U.S. Mail, first-class postage prepaid, addressed as follows:

Steven C. Schaffer
Schwartz, Woods & Miller
1350 Connecticut Avenue, N.W.
Suite 300
Washington, D.C. 20036-1717

This the 6th day of July, 2004.

Sandra S. Krepps

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